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Attorneys for Defendant  
KURT STOCKS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JAMES MECHAM, KURT STOCKS,  
and HEIDI EDWARDS,

Defendants.

Case No: 2:22-cr-00161-JAM

**STIPULATION TO CONTINUE STATUS  
CONFERENCE AND EXCLUDE TIME;  
ORDER**

Date: February 13, 2024

Time: 9:00 a.m.

Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Heiko Coppola, counsel for Plaintiff; Thomas A. Johnson, counsel of record for Defendant James Mecham; Malcolm Segal, counsel of record for Defendant Kurt Stocks; and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Defendant Heidi Edwards, that the status conference currently set for February 13, 2024, can be **CONTINUED to June 25, 2024, at 9:00 a.m.**, and that time may be excluded as detailed below.

1 The above-named parties specifically stipulate as follows:

2 1. By previous order, the status conference as to all defendants in this matter  
3 was continued to February 13, 2024. ECF No. 47.

4 2. With the instant stipulation, all parties now seek to continue the status  
5 conference to June 25, 2024, and to exclude time under Local Code T-4 February  
6 13, 2024 through June 25, 2024.

7 3. The legal framework in this case is very complex; defense counsel for all  
8 defendants represents that they require additional time to conduct legal research in  
9 this case, which involves the interplay of federal law, California law, and Arizona law;  
10 conduct defense investigations; research defenses; explore potential resolutions; and  
11 otherwise prepare for trial. Counsel believes that failure to grant the requested  
12 continuance would deny them the reasonable time necessary for effective  
13 preparation, taking into account the exercise of due diligence.

14 4. The government does not object to the continuance.

15 5. Therefore, the parties stipulate that the ends of justice served by granting  
16 the continuance outweighs the best interest of the public and all defendants in a  
17 speedy trial, and respectfully request the Court so to find. For the purpose of  
18 computing time under 18 U.S.C. § 3161 et seq. (the Speedy Trial Act), the parties  
19 request that the time period between February 13, 2024 and June 25, 2024  
20 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local  
21 Code T4), because it would result from a continuance granted by the Court at the  
22 defense's request, based on a finding that the ends of justice served by granting the  
23 continuance outweighs the best interest of the public and all defendants in a speedy  
24 trial.

25 The parties therefore respectfully request this Court to adopt the parties'  
26 stipulation, detailed above, in full as its Order.

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1 Dated: February 5, 2024.

Respectfully submitted,

2 **SEGAL & ASSOCIATES, PC**

3  
4 By: /s/ Malcolm Segal  
MALCOLM SEGAL  
5 Attorneys for Defendant  
6 KURT STOCKS

7 Dated: February 5, 2024.

**LAW OFFICES OF THOMAS A. JOHNSON**

8  
9 By: /s/ Thomas A. Johnson  
10 THOMAS A. JOHNSON  
11 Attorneys for Defendant  
JAMES MECHAM

12 Dated: February 5, 2024.

**HEATHER WILLIAMS**  
Federal Defender

13  
14 By: /s/ Christina Sinha  
15 CHRISTINA SINHA  
16 Attorneys for Defendant  
17 HEIDI EDWARDS

18 Dated: February 5, 2024.

**PHILLIP A. TALBERT**  
United States Attorney

19  
20 By: /s/ Heiko Coppola  
21 HEIKO COPPOLA  
22 Assistant United States Attorney  
23 Attorneys for Plaintiff  
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**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

DATED: February 06, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE